



UNITED STATES MARINE CORPS

ENGINEER COMPANY B (-)
6TH ENGINEER SUPPORT BATTALION
4TH FORCE SERVICE SUPPORT GROUP, FMF
ARMED FORCES RESERVE CENTER
1901 SOUTH KEMBLE AVENUE
SOUTH BEND, INDIANA 46813-1798

IN REPLY REFER TO:

5100

Med

11 Mar 04

COMPANY POLICY LETTER 10-04

From: Commanding Officer/Inspector-Instructor
To: Distribution List

Subj: **HAZARD COMMUNICATION (HAZCOM) PROGRAM**

Ref: (a) 29 CFR PART 1910.1200
(b) Executive Order 12196, Occupational Safety and Health
(c) MCO 5100.8E
(d) ForO 5100.10

Encl: (1) Hazardous Material List

1. Purpose. The purpose of the Hazardous Communication Program (HCP) is to ensure that all personnel are informed of the potential hazards associated with any chemicals used in the work environment. This is designed to establish policy, assign responsibility, and provide guidance for administering an effective Hazard Communication Program.

2. Scope. The provisions of this apply to all military and civilian personnel who are potentially exposed to hazardous chemicals in the workplace. Civilian contractors shall be informed of the hazardous material used at the unit, the protective measures required when working with or otherwise exposed to the hazardous material, and the provisions of this.

3. Background.

a. Reference (a), "Hazard Communication, the Standard," was passed in 1983 in response to the need for a new approach to worker safety and health. The Standard established requirements for training and informing personnel on hazardous materials in workspaces. These requirements were designed to ensure occupational safety and individual health.

b. The standard requires chemical manufacturers or importers to assess the hazards of chemicals which they produce or import, and all employers to provide information to their employees about the hazardous chemicals to which they are exposed, by means of a hazard communication program, labels and other forms of warning, material safety data sheets, and information and training. In addition, the standard requires distributors to transmit the required information to employers.

c. The standard applies to any chemical which is known to be present in the workplace in such a manner that employees may be exposed under normal conditions of use or in a foreseeable emergency.

d. The standard does not apply to:

- (1) Food or alcoholic beverages which are sold, used, or prepared in a retail establishment (such as a grocery store, restaurant, or drinking place), and foods intended for personal consumption by employees while in the workplace;
- (2) Ionizing and non-ionizing radiation; and
- (3) Biological hazards.

e. The Standard initially applied only to employers and employees in manufacturing, but its scope was expanded on 24 August 1987 to include all sectors, including all federal agencies. When reference (b) was enacted, all federal agencies were required to comply with Occupational Safety and Health (OSHA) criterion listed under the standard. In reference (c), the Marine Corps mandated that requirements set forth in reference (a) would be applied in Marine Corps workplaces worldwide.

f. As required by the references, a Hazard Communication Program will include requirements for training, labeling, and other forms of warnings, including Material Safety Data Sheets (MSDS).

4. Policy. The members of this command will comply with the Hazard Communication Program (HCP) to ensure that hazardous substances are identified, stored, and handled properly; that proper safety precautions are taken and personal protective equipment is available and utilized; and that dangerous situations are reported and corrected.

This program is established to provide the necessary information to promote a proficient HCP by providing training on Material Safety Data Sheets (MSDS), labeling and marking of containers, posting of warning signs in areas which present a potential hazard, and the introduction of a formal training program which documents and reinforces the HCP. The following serves as general guidance for the HCP.

a. Hazardous Chemical Inventory.

(1) An important and integral part of the HAZCOM program is the Hazardous Chemical Inventory. The inventory provides a consolidated list of chemicals in the workplace that serves several purposes:

- (a) Allows the workers to see all the potentially hazardous chemicals that they might be exposed to.
- (b) Provides a simple means to compare approved chemicals for supply personnel to consolidate orders to minimize on-hand quantities.
- (c) Provides a convenient way to verify MSDSs are on-hand for all chemicals.

(2) The Hazardous Chemical Inventory should include at least the following:

- (a) Chemical Name.
- (b) Hazardous Component.
- (c) Area the chemical is used in. (Storage area is also recommended.)
- (d) Personnel Protective Equipment (PPE) required.

b. Material Safety Data Sheet (MSDS).

(1) The MSDS is in itself a stand-alone document. It provides explicit information on a hazardous material including product information, associated hazards, proper handling, storage and disposal procedures, and other pertinent data. MSDS sheets must be on hand for each hazardous material maintained by the Command. Each section handling and/or using hazardous materials must maintain a completed MSDS sheet for each hazardous material used in that location. MSDS sheets must be readily accessible to all personnel in the section. It is important to ensure that the

MSDS on-hand is the right one for the chemical in question (i.e. manufacturer on MSDS matches manufacturer on chemical label).

(2) An MSDS can be obtained from the Hazard Communication Coordinator or the Hazardous Material Manager, who will acquire MSDS by one of the following means:

- (a) Check the DoD Hazardous Material Information System (HMIS) or CD-ROM for the subject material and extract the information via printer from the HMIS data base.
- (b) Call the manufacturer of the substance, browse the internet or submit a FAX to request a MSDS. The manufacturer should be allowed approximately 30 days to respond before a follow-up is initiated. After 30 days, a second request should be sent. If the manufacturer still does not provide the MSDS, contact higher headquarters for assistance.

c. Labels and Other Forms of Warning

(1) Chemical manufacturers, importers and/or distributors are required to label product containers. All containers received and subsequently used or stored at the unit will be properly labeled. The labels will not be removed or defaced. At a minimum, the label will identify the chemical, list appropriate hazard warnings, and contain the name and address of the manufacturer, importer, or distributor. The corresponding MSDS sheet should be used to verify this information.

(2) Containers procured locally for use with, or storage of chemicals must be approved by the Hazardous Material Manager prior to use. These containers, except for immediate-use containers, must be labeled appropriately. Immediate-use containers are small containers into which necessary amounts of a chemical are placed for immediate use relative to a job action. These containers will be under the control of and used by the person who transfer the chemical from the original labeled container and only within the work shift which it is transferred. The immediate-use containers will also have an approved National Fire Protection Association (NFPA) label as per enclosures as well as the identity of the contents stenciled on the side or a label on the container identifying its contents.

d. Training.

(1) Hazardous Communication (HAZCOM) training will be a concerted effort by all sections. All personnel reporting to the unit will receive HAZCOM training.

(2) The section supervisors will bear the burden of ensuring that their personnel have received HAZCOM training.

(3) All personnel will receive training in the:

- (a) Purpose of the HAZCOM Program;
- (b) Hazards associated with chemicals in the unit;
- (c) Protective measures against those chemical hazards;
- (d) Response procedures for hazardous chemical leaks and spills.

(4) This training will be provided:

- (a) Upon initial assignment;
- (b) Whenever a new chemical is introduced into the unit;

(c) and at refresher sessions given quarterly. These sessions may be modular in nature covering parts of the entire program and acting as a refresher/reminder. (The scheduled training will be incorporated in the unit's ground training schedule.)

e. Housekeeping.

(1) Housekeeping is an important part of a successful part of a good HAZCOM programs. OSHA requires that "all places of employment, passageways, storerooms, and service rooms shall be kept clean and orderly and in a sanitary condition" (29 CFR 1910.22(a)(1)). Good housekeeping helps ensure that personnel exposure to unnecessary hazards is minimized.

(2) Housekeeping procedures should the following:

- (a) Combustible wastes should be collected and safely disposed of at the end of each day.
- (b) Clean rags should be maintained in an enclosed container and marked "Clean Rags".
- (c) Contaminated rags should be maintained in containers clearly marked "Dirty Rags."

- (d) Paints and other flammables, and all other hazardous material should be returned to the appropriate storage locker immediately after use. No hazardous material should remain in working spaces when it is not being used.
- (e) Floors should be kept clean and free from slip hazards.
- (f) Trash should be removed daily to reduce fire hazards.

5. Action.

a. The is responsible for the implementation of the Hazard Communication Program. He/she will assign a Hazardous Communication Coordinator (HCC) in writing. The HCC may serve in other billets (e.g. Safety Manager, Hazardous Material Manager, etc.).

b. Hazardous Communication Coordinator. The Hazardous Communication Coordinator will coordinate all actions relative to the HCP. He/she will:

(1) Maintain a current master inventory listing of all hazardous chemicals used or stored at the unit. (The inventory may be manual, such as the form shown in enclosure (1), or may be a computer database. The inventory will indicate amount and location of the chemical. The master inventory will be reviewed monthly and applicable lists will be distributed to appropriate sections.

(2) Maintain a master library of MSDS. An MSDS will be available for each chemical used or stored at the Command.

(3) Inspect all containers weekly to ensure that the containers are not damaged, that the required markings/labels are complete and legible, and that they are not being used for non-approved materials. A logbook or a database will be maintained to document these inspections.

(4) Forward a copy of the hazardous material inventory to the local fire department.

(5) Post signs at the storage point(s) stating "HAZARDOUS MATERIAL STORAGE - READ MSDS PRIOR TO USE," "EYE HAZARD," or other appropriate signs for the items stored or used.

c. Hazardous Material Manager. The Hazardous Material Manager will:

- (1) Review all chemicals received by the unit to determine potential hazards associated with that chemical. If the chemical is determined to be hazardous or potentially hazardous, the Hazard Communication Coordinator will be notified immediately so the information concerning the hazard and appropriate protection and counteractive measures can be disseminated to all personnel who may be exposed to the hazard.
- (2) Review all requisitions for unlisted hazardous materials to ensure the purchase is warranted.
- (3) Inspect Hazardous Materials on-hand to verify shelf-life and utilization.
- (4) Review (on a quarterly basis) the Hazardous Material List and identify those items that are no longer utilized or those chemicals that can be replaced with less hazardous materials.

d. Safety Manager. The Safety Manager will:

- (1) Inspect all personal protective equipment (PPE) for serviceability and availability.
- (2) Inspect eyewash stations for placement, readiness, and logs of flushing (weekly unless otherwise specified by the manufacturer).
- (3) Inspect first aid kits.

e. Admin SNCO/NCO. The Admin SNCO/NCO will ensure that:

- (1) Required changes to this order are published and disseminated to all personnel.
- (2) All correspondence received related to Hazard Communication is routed to the Hazard Communication Coordinator and the Safety Manager.
- (3) All new personnel conduct the proper check-in procedures through the Safety Manager and the Hazardous Communication Coordinator.

f. Training SNCO/NCO. The Training SNCO/NCO will:

- (1) Ensure that all classes are noted in each member's training record.

(2) Ensure that classes are included in the quarterly training schedule.

(3) Assist in matters relating to training aids and devices to improve the effective worth of this program.

g. Supply SNCO/NCO. The Supply SNCO/NCO will:

(1) Report any requisitions of hazardous materials ordered by unit personnel to the Hazardous Material Manager.

(2) Minimize the requisition of any item to the barest essentials if listed on the Hazardous Chemical Inventory.

(3) Request MSDSs on all hazardous materials ordered by this unit for the first time. These MSDSs are to be on hand prior to or upon receipt of shipment.

(4) Requisition, as required, safety equipment and cleanup items requested by the Hazard Communication Coordinator, the Safety Manager, and the Hazardous Material Manager.

(5) Budget sufficient funds each fiscal year to support this order.

(6) Refer all purchase requests for hazardous materials not on the Hazardous Chemical Inventory to the Hazardous Material Manager.

h. Corpsman. The Corpsman will:

(1) Ensure that a Blood Spill Kit is on hand.

(2) Conduct monthly hygiene inspections of work spaces.

i. Supervisors. Supervisors will be responsible for ensuring that the HCP is adhered to in their work spaces. Specifically, supervisors will:

(1) Maintain an inventory of chemicals used or stored in their workspaces.

(2) Ensure that MSDS sheets are readily available for all chemicals in their work spaces.

(3) Incorporate quarterly HAZCOM training in their training programs and ensure documentation of the training and attendance.

(4) Brief personnel before commencing non-routine tasks (e.g. rifle cleaning).

j. All Personnel. All personnel will:

(1) Familiarize themselves with the provisions and requirements of this program.

(2) Read and understand all Material Safety Data Sheets for chemicals in their work spaces.

(3) Wear all required personal protective equipment (PPE) as required by the MSDS.

(4) Return all unused chemicals to flammable storage lockers at the completion of the job or at the end of the work shift, whichever comes first.

(5) Properly dispose of used chemicals after job completion.

(6) Do not smoke or create sparks around flammable or combustible materials.

(7) Clean up spills immediately and report spill to Hazardous Material Manager and/or Safety Manager.

(8) Wash hands before eating, drinking, or smoking.

(9) Report all accidents immediately to appropriate supervisor and the Safety Manager.

(10) Only properly dispose of chemicals (i.e. not down the drain).

(11) Only used approved chemicals for tasks.


(12) Only use approved containers that are properly labeled.

(13) Properly dispose of contaminated rags (i.e. Use only approved containers - do not dispose of rags in ordinary trash receptacles/dumpsters).

(14) Use a containers for the purpose it is intended
for.



L. R. Bertschy II
Commanding Officer



A.N. Green III
Inspector- Instructor

HAZARDOUS MATERIAL INVENTORY LIST

<u>Chemical</u>	<u>Hazardous Component</u>	<u>Area Used</u>	<u>Area Stored</u>	<u>PPE Required</u>
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Enclosure (1)